UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE Jarrett M. Nahon Debtor **CHAPTER 13**

BANKRUPTCY NO. 19-12306-amc

STIPULATION

:

Pursuant to the Motion for Relief from the Automatic Stay filed by Quaker's Green Community Association, the parties hereby stipulate and agree as follows:

- 1. As of the date hereof, Debtor agrees that the assessment delinquency owed to Movant is \$6,003.00.
- 2. The parties hereby agree that the automatic stay under 11 U,S.C. 362(a) shall remain in full force and effect provided that Debtor make payment to Quaker's Green Community Association as follows: Beginning September 1, 2023 and on every first of the month thereafter until the sum stated in paragraph 1 is paid in full, Debtor shall make payment of \$250.00. In addition, Debtor shall make timely payment of all regular assessments and charges as they become due. Payments which are not received timely will be subject to late charges.
- 3. Should Debtor fail to make timely payments as provided herein, Quaker's Green Community Association agrees to give to Debtor ten (10) days written notice of default, mailed first class mail, postage prepaid to Debtor, and counsel for Debtor.
- 4. Should Debtor fail to make any of the payments as aforesaid within ten (10) days of the date of the written notice of default, Quaker's Green Community Association may file a Certification of Default with the Bankruptcy Court, and an Order shall be entered without further notice or court appearance, granting Quaker's Green Community Association Relief from the Automatic Stay as requested in its Motion.
- 5. Conversion of the instant case into a Chapter 7 shall constitute default hereunder, and shall entitle Quaker's Green Community Association to a send a notice of default pursuant to paragraphs 4 and 5 hereof, and if not cured, obtain Relief from the Automatic Stay.
- 6. By executing this stipulation on behalf the respective party, the person signing verifies that they are authorized to do so.

SIGNATURE PAGE TO FOLLOW:

Clemons Richter & Reiss, P.C.
Stefan Richter, Esquire Attorney for Movant
Jon M. Adelstein, Esquire Attorney for Debtor
APPROVED AND MADE AN ORDER OF COURT THIS DAY OF 2023.
BY THE COURT
Ashely M. Chan, Bankruptcy Judge